

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

v.

JACK BRIAN LAFORTE,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)

Criminal No.: 19-256

**SENTENCING MEMORANDUM**

Filed on behalf of Defendant,  
Jack Brian LaForte

Counsel of Record for this Party:

Lyle Dresbold, Esquire  
Pa. I.D. #208123

Shrager Defense Attorneys  
617 Frick Building  
437 Grant Street  
Pittsburgh, PA 15219

(412) 261-6198 - office  
(412) 765-3230 - facsimile

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	Criminal No.: 19-256
	)	
v.	)	
	)	
JACK BRIAN LAFORTE,	)	
	)	
Defendant.	)	

**SENTENCING MEMORANDUM**

AND NOW, comes Defendant, Jack Brian LaForte, by and through his attorney, Lyle Dresbold, Esquire, who respectfully submit the following memorandum to aid this Honorable Court in the invocation of its sentencing discretion.

Jack LaForte is remorseful for his conduct and regrets the harm he has caused others. Like most people with addictions, he was ashamed of what he was doing. Once he was confronted with exposure and knowing the seriousness of the charges he was facing, Jack admitted his conduct to himself, his family, the investigators involved and the Court. He has asked forgiveness of those he knows personally and prays that this Honorable Court show him mercy.

Jack LaForte is fifty-four (54) years old and resides in Monessen, Westmoreland County, Pennsylvania with his eight (8) year old dog, Deuce, that he raised since six (6) months old and cares for deeply. He has a strong relationship with his elderly parents, Jack (82 years old) and Marlene (77 years old). Jack visits them daily and assists with house and yard work that they can no longer perform. He is also kind to his elderly neighbors helping them with everything from resetting a circuit breaker to shoveling their walkways.

Mr. LaForte has worked steadily since the age of fifteen (15). He once owned a local record store, L & M Record World in Monessen, and drove for both charter and school bus companies. For the past thirty-three years, Jack worked at Hilltop Bus Line Company with a flawless employment record. He eventually became the lead bus mechanic who ran the entire garage. During his employment at Hilltop Bus Line Company, he worked with Pennsylvania State Troopers and the Pennsylvania Public Utility Commission on school and charter bus safety inspections, receiving much praise for his work ethic and job performance.

Mr. LaForte was terminated from Hilltop Bus Line Company when he was indicted. Instead of giving up, he submitted one hundred five (105) applications, attended twelve (12) interviews and was ultimately hired on July 13, 2020 as a full-time maintenance technician at Pilot/Flying J at the Flying J Travel Plaza in Smithton, Pennsylvania.

Jack deeply cares about others. He donates money and winter clothes to children who are less fortunate and has planned numerous charter bus trips (i.e. casinos, bingo, dances) for senior citizens. He was the top requested bus driver at his company due to his caring and kind nature.

Jack started coaching youth sports at sixteen (16) years old and remained involved with numerous sporting programs for twenty (20) years. During that period, he donated money and equipment to underprivileged youth athletes so that they could participate in football, baseball and basketball.

For the past fifteen (15) years, Mr. LaForte makes twice-annual monetary donations to each of the following organizations: ASPCA, Humane Society, Toys for Tots, Boys Town, Make-a-Wish Foundation, St. Jude Children's Hospital, Special Olympics, Covenant House, Salvation Army and the National Law Enforcement Officers Memorial Fund.

Mr. LaForte served on the board for the City of Monessen Civic & Recreation Authority (4 years) and the Raven Athletic Association (24 years as vice president and 10 years as president) which is a non-profit organization donating to youth sports and community events. For the past ten (10) years, he has donated his time and money to assist people struggling with drug additions to find and enroll into rehabilitation programs.

Prior to being indicted, Defendant attended an assessment with Dr. Allan D. Pass and began a structured sexual offender treatment program. He has remained fully compliant with the recommended treatment and recently passed a routine polygraph examination. Counsel for Defendant will be filing treatment documentation for this Honorable Court's review prior to sentencing.

Mr. LaForte intends on attending programs offered through the Bureau of Prisons and is willing to participate in any and all additional treatment that may be recommended. Additionally, Jack hopes that, during his incarceration, he can aid others who are suffering from the similar struggles he has endured over the past couple of years.

Since his arraignment on August 26, 2019, Defendant has been on an unsecured appearance bond and is in compliance with all Court ordered conditions of his release. Jack understands how his behavior has affected not only his family, but, most importantly, the child victims and their families. Mr. LaForte has expressed overwhelming remorse for his conduct and an immense regret for the harm he has caused others. He is thankful that, despite his shortcomings, he has been able to maintain strong relationships with his parents, family and friends since his arrest. His friends and family have written letters of support describing the person they have come to know which are attached herein as an exhibit.

Jack LaForte accepts total responsibility and will comply with any conditions of the sentence to be imposed by this Honorable Court.

Respectfully submitted,

/s/ Lyle L. Dresbold  
Lyle L. Dresbold, Esquire  
Pa. I.D. #208123

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	Criminal No.: 19-256
	)	
v.	)	
	)	
JACK BRIAN LAFORTE,	)	
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the within Sentencing Memorandum was served upon the following parties on the 4<sup>th</sup> day of November, 2020, via electronic filing:

The Honorable Arthur Schwab  
U.S. Post Office and Courthouse  
700 Grant Street  
Pittsburgh, PA 15219

Heidi M. Grogan, A.U.S.A.  
U.S. Post Office and Courthouse  
700 Grant Street  
Suite 4000  
Pittsburgh, PA 15219

/s/ Lyle L. Dresbold  
Lyle L. Dresbold, Esquire  
Attorney for Defendant